ECF CASE JUDGE DANIELS

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JOE HAND PROMOTIONS, INC., as Broadcast Licensee of the June 11, 2005 Tyson/McBride Program

Plaintiff,

**RULE 54B STATEMENT** Civil Action No. 07-CV-6907 HON. GEORGE B. DANIELS

-against-

RICARDO MARTINEZ, Individually and d/b/a LUCKY 7,

Defendants.

Plaintiff, Joe Hand Promotions, Inc., as and for its Statement pursuant to Rule 54(b) of the Federal Rules of Civil Procedure hereby states as follows:

There is no just reason for delay in this Default Judgment as the interest of justice require the issuance of judgment as requested without further delay, as the defaulting Defendants are the only remaining Defendants in this case.

Dated: October 15, 2007 Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein Julie Cohen Lonstein Bar Roll No. JL8521 Attorney for Plaintiff 1 Terrace Hill; PO Box 351 Ellenville, NY 12428 Telephone: 845-647-8500

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